

**THE LAW FIRM OF HUGH H. MO, P.C.**

225 BROADWAY, 27TH FLOOR

NEW YORK, NEW YORK 10007

(212) 385-1500

FAX: (212) 385-1870 / E-MAIL **APPLICATION GRANTED**

**SO ORDERED** 

**VERNON S. BRODERICK**

**U.S.D.J.** 3/8/2016

***Filed via ECF***

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 415  
New York, NY 10007

**Re: United States v. John W. Ashe, et. al (Ng Lap Seng)**  
**Docket No. 15 cr. 706 (VSB)**

Dear Judge Broderick:

We are co-counsel with Brafman & Associates for Ng Lap Seng in the above-referenced matter. We write in connection with our request to amend the bail conditions related to one of the signors of the bail bond, Feilang Ng aka Janet Ng, Mr. Ng's daughter. Pursuant to the conditions of the bail bond, Janet was required to reside with Mr. Ng during pendency of the case and to surrender her passport. We hereby request that Janet be permitted to travel to Hong Kong, Macau and Manila during March 16, 2016 to April 2, 2016, to visit her parents-in-law due to their injuries from recent accidents. Janet's mother-in-law recently fell and severely injured her head during the Chinese New Year last month and her father-in-law suffered a severe burn at home last December and both are recovering in Hong Kong and Manila, respectively. Under the circumstances, as the only daughter-in-law, Janet wants to visit them and other family members, as well as to attend to her personal matters since she has been absent from home and been in New York since last August.

Janet plans to depart with her son, Malvin, age 2, on March 16<sup>th</sup> and return on April 2<sup>nd</sup>, and, request the Court to amend her suretor's conditions allowing her to travel and for the return of her passport by Pretrial Services. Upon her return to the States, she will surrender her passport to Pretrial Services. We have advised the government and Pretrial Services of our request, and the government has no objection.

We respectfully request the Court to grant our request. Thank you for your kind consideration.

Respectfully yours,

  
Hugh H. Mo.

cc: All counsel of record via ECF  
Dennis Khilkelvich, Pre-Trial Services (via email)